

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION**

DONNA K. SOUTTER,  
*on behalf of herself and those  
similarly situated,*

Plaintiffs,

v.

Civil Action No. 3:10CV00107(REP)

EQUIFAX INFORMATION SERVICES LLC,

Defendant.

**JOINT PROPOSED PHASE II SCHEDULE AND PLAN**

Plaintiff Donna Soutter and Defendant, Equifax Information Services LLC, by counsel,  
file their Joint Proposed Phase II Schedule and Plan ("Joint Proposal") as follows:

1. The parties generally agree on the following schedule for Phase II:

**Beginning of Phase II Discovery:** May 20, 2011

**Plaintiff's Expert  
Disclosures Due:** August 31, 2011

**Defendant's Expert  
Disclosures Due:** September 30, 2011

**End of Discovery:** November 18, 2011

**Deadline to File Motions  
for Summary Judgment:** December 1, 2011

**Responses to Motions  
for Summary Judgment:** December 16, 2011

**Reply Briefs on Motions  
for Summary Judgment:** December 23, 2011

**Trial Date:** 45 - 60 Days after ruling on all pending dispositive  
motions. Five day trial.

2. A proposed order adopting this schedule is being circulated and will be forwarded to the court as soon as possible.

Wherefore, the parties request that the Court enter a Phase II schedule consistent with the above.

Respectfully submitted this 13th day of May, 2011.

/s/

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**CERTIFICATE OF SERVICE**

I hereby certify that on the 13th day of May, 2011, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

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/s/  
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